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August 4, 2006

Mary Rupp  
Secretary of the Board  
National Credit Union Administration  
1775 Duke Street  
Alexandria, VA 22431-3428

Subject: Security Service FCU Comments on Proposed Rule Part 740

Dear Ms. Rupp:

We have reviewed the subject proposed rule, and respectfully offer our comments for NCUA consideration. The requirement to display new signage and revise all advertisements and other materials that refer to NCUSIF coverage within 60 days of receiving the initial supply of revised official signs from NCUA places great operational burdens and costs on credit unions.

While not necessarily required by regulation, Security Service Federal Credit Union (SSFCU) displays the official insurance sign at virtually all member touch points, on all marketing materials, and on many promotional items. More specifically, the signage is displayed as follows:

- 99 automated teller machines;
- 29 member service facilities with hundreds of member service desks, teller windows, and drive-through lanes;
- Marketing materials, including calendars and brochures for products and services; and
- Member receipts, various member product/service applications, and most other printed materials.

Based on the estimated 700 insurance signs currently deployed at member touch points, the task of replacing each and every sign is not simple or immaterial. Many of the signs have been commercially developed to coordinate with the styling and décor of newer service facilities, adding another hurdle to the replacement effort, as these signs will need to be ordered through various vendors.

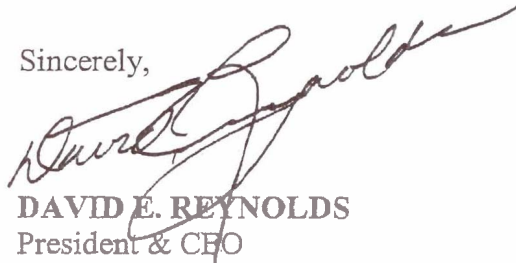
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The cost of replacing various printed materials would be significantly reduced if credit unions were allowed to use current stocks over a protracted implementation period. Over the several months worth of brochures, receipts, forms, and promotional material currently on hand, Security Service FCU costs related to destroying and replacing various printed materials within the proposed timeframe is estimated to exceed \$75,000.

Consequently, we respectfully request that the proposed 60-day compliance window be extended to 6 months from the date a credit union receives the initial supply of revised official signs from the NCUA, so that significant portions of existing supplies can be used during the normal course of business, and signage can be replaced at a reasonable pace and in an orderly fashion.

Thank you for considering the comments of Security Service Federal Credit Union. If you have any questions or require clarification, Chief of Staff Howard Baker or I am available at your convenience at (210) 476-4550.

Sincerely,



**DAVID E. REYNOLDS**  
President & CEO